

## Heidi McIntyre-Wilkinson

---

**From:** Heidi McIntyre-Wilkinson  
**Sent:** Thursday, October 24, 2013 9:08 AM  
**To:** 'woolseym@greenek12.org'  
**Cc:** Sam Marshall; Tom Moss; 'jcd107@gmail.com'  
**Subject:** Broken Circle Farm - Additional Items  
**Attachments:** CAFO Permit Application Broken Circle Farm Markup.pdf; NMP Declarations page 8-24-12.doc; Email\_AWarden\_to\_JDonaldson\_022212.pdf

Mrs. Woolsey,

This morning I spoke with your husband regarding the Broken Circle Farm's pending CAFO permit application. I have attached a copy of comments sent to your technical service provider (TSP), John Donaldson, via e-mail in February of 2012. Also attached is the permit application as we received it – I have placed some comments into the document on Pages 9, 22, 23, and 24 to indicate some of the problem areas identified by Angela Warden in 2012. Addressing the comments on these pages will resolve Items (a), (b), and (d) from Angela's e-mailed comments. I have attached a *Declarations to Nutrient Management Plan* form, which replaces the now obsolete *Addendum to Nutrient Management Plan* form mentioned in Item (e). If you complete and return this form, it will resolve Item (e). I just received the faxed litter analysis from Mr. Woolsey (which resolves Item (c) from Angela's e-mail). If you could, please confirm receipt of this e-mail; if you have any trouble opening/viewing the attachments, please let me know and I can either fax them or mail hard-copies. If I can be of any additional assistance, feel free to contact me at [Heidi.mcintyre-wilkinson@tn.gov](mailto:Heidi.mcintyre-wilkinson@tn.gov) or 615-837-5492.

Best Regards,  
Heidi McIntyre-Wilkinson

---

Heidi McIntyre-Wilkinson, Environmental Specialist  
Nonpoint Source and CAFO Programs  
Tennessee Department of Agriculture  
615-837-5492  
[heidi.mcintyre-wilkinson@tn.gov](mailto:heidi.mcintyre-wilkinson@tn.gov)  
<http://www.tn.gov/agriculture/water/index.shtml>



*All emails and attachments sent and received from this email address related to the official business of the Tennessee Department of Agriculture are subject to the Tennessee Public Records Act. Unless the content of an email or attachment is subject to a specific exception in the public records act, emails and attachments sent to and from this agency should be presumed to be open to public inspection and maintained pursuant to applicable retention requirements.*

## Angela Warden

---

**From:** Angela Warden  
**Sent:** Wednesday, February 22, 2012 9:18 AM  
**To:** 'John Donaldson'  
**Subject:** RE:

Hi John,

Thanks for getting this to us. Looking at the plan, I notice a couple of things that we need to:

- a) Will you fix some of the pages so that all of the tables will show (for example: page 23 and page 24)?
- b) Also, the site boundaries are cut off on pages 9 and 22. Will you change the scale some so that the entire site boundary is seen?
- c) I thought that this site was already active. Why are litter analyses not provided?
- d) Is that a blue-line going in between houses 1 and 2? What in the world?
- e) Please provide a signed Addendum.

Let me know what you think.

Thanks,

Angela

---

**From:** John Donaldson [<mailto:lcd107@gmail.com>]  
**Sent:** Wednesday, February 22, 2012 8:34 AM  
**To:** Angela Warden  
**Subject:**

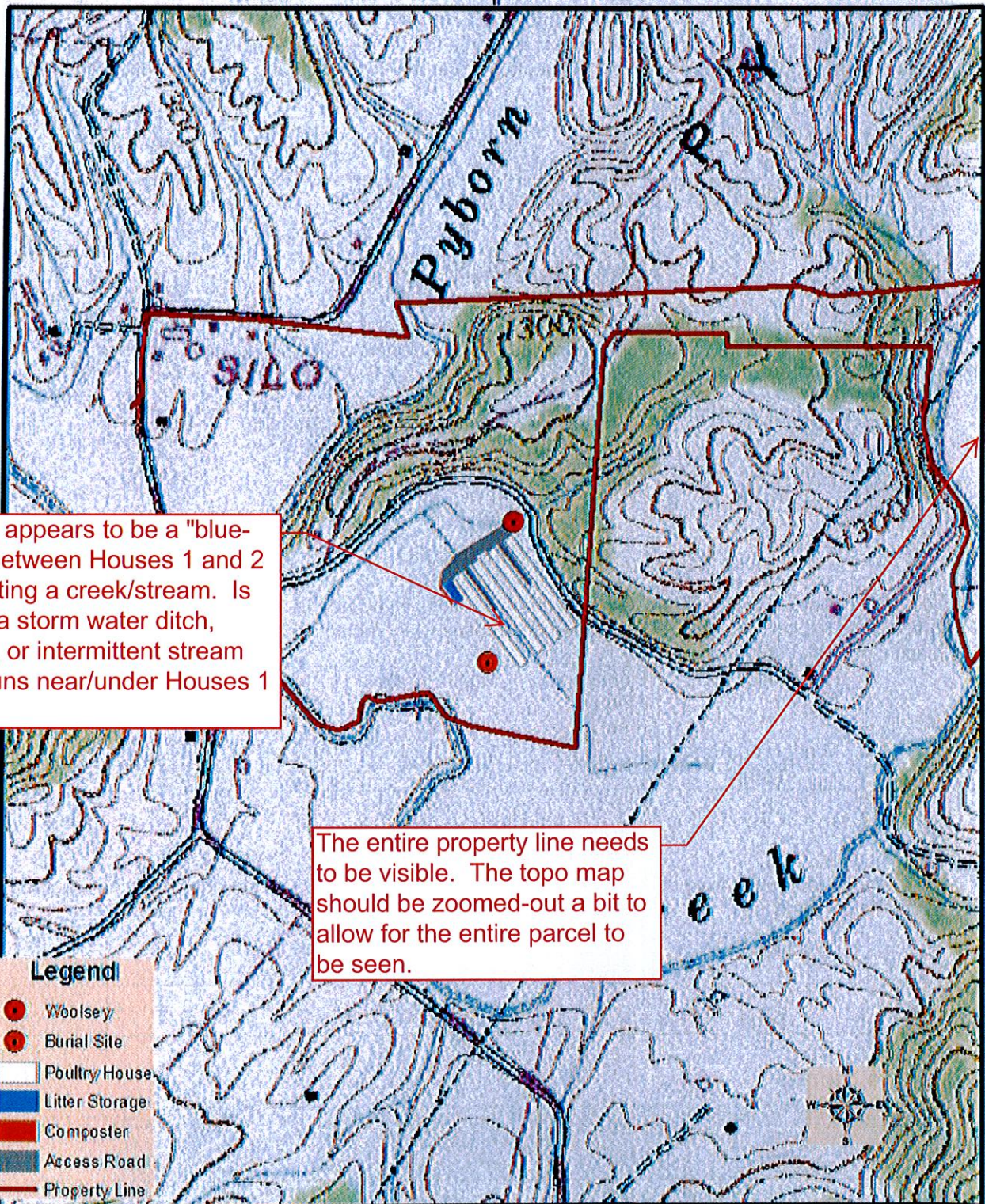
Angela

Woolsey CNMP.

John

# Jerome Woolsey Topo

Date: 8/2/11



There appears to be a "blue-line" between Houses 1 and 2 indicating a creek/stream. Is there a storm water ditch, creek, or intermittent stream that runs near/under Houses 1 or 2?

The entire property line needs to be visible. The topo map should be zoomed-out a bit to allow for the entire parcel to be seen.

## Legend

- Woolsey
- Burial Site
- Poultry House
- Litter Storage
- Composter
- Access Road
- Property Line

Lat/Long: 36°21'43.5"N / 82°44'7.10"W

Validus:

0

550

1,100

Feet  
2,200

RECEIVED

FEB 22 2017



## Section 6. Nutrient Management

The goal of this section is to develop a nutrient budget for nitrogen, phosphorus, and potassium that includes all nutrient sources. From this nutrient budget, projections will be made concerning the sustainability of the plan for the entire crop sequence. In most cases, the nutrient budget is accurate for the first year only. If nutrients from sources not included in this plan are used in the first year, the nutrient budget will be revised to account for those inputs. In subsequent years considered in this plan, a nutrient budget will be developed using current soil analysis data; current manure analysis data; the actual crops to be used and their projected yields and nutrient needs and will account for nutrients from all sources. Guidance in developing a nutrient budget may be obtained from your NRCS Field Office or your University of Tennessee Cooperative Extension Service Agent. Land application procedures must be planned and implemented in a way that minimizes potential adverse impacts to the environment and public health.

If land is included in the future for application that is not under the ownership/control of the producer, appropriate agreements will be obtained.

### 6.1. Manure Nutrient Analysis

Manure Source	Dry Matter (%)	Total N	NH <sub>4</sub> -N	Total P <sub>2</sub> O <sub>5</sub>	Total K <sub>2</sub> O	Avail. P <sub>2</sub> O <sub>5</sub>	Avail. K <sub>2</sub> O	Units	Analysis Source and
House 1		73.9	20.0	75.7	77.0	75.7	77.0	Lb/Ton	MMP Estimate
House 2		73.9	20.0	75.7	77.0	75.7	77.0	Lb/Ton	MMP Estimate
House 3		73.9	20.0	75.7	77.0	75.7	77.0	Lb/Ton	MMP Estimate
House 4		73.9	20.0	75.7	77.0	75.7	77.0	Lb/Ton	MMP Estimate
Dry Stack								Lb/Ton	MMP Estimate

(1) Entered analysis may be the average of several individual analyses.

(2) Tennessee assumes that 100% of manure phosphorus and 100% of manure potassium is crop available. First-year per acre nitrogen availability for individual manure applications is given in the Planned Nutrient Applications table. For more information about nitrogen availability in Tennessee, see "Manure Application Management," Tables 3 and 4, Tennessee Extension, PB1510, 2/94 ([http://wastemgmt.ag.utk.edu/ExtensionProjects/extension\\_publications.htm](http://wastemgmt.ag.utk.edu/ExtensionProjects/extension_publications.htm)).

The version we received at TDA did not have the entire table. Please provide a copy of the full table.

RECEIVED

RECEIVED

FEB 22 2012

## 6.2. Manure Inventory Annual Summary

Manure Source	Plan Period	On Hand at Start of Period	Total Generated	Total Imported	Total Trans- ferred In	Total Applied	Total Exported	fe
House 1	Oct '11 - Sep '12	24	162	0	0	0	72	
House 2	Oct '11 - Sep '12	24	162	0	0	0	72	
House 3	Oct '11 - Sep '12	24	162	0	0	0	72	
House 4	Oct '11 - Sep '12	24	162	0	0	0	72	
Dry Stack	Oct '11 - Sep '12	0	0	0	360	0	180	
<b>All Sources</b>	<b>Oct '11 - Sep '12</b>	<b>96</b>	<b>648</b>	<b>0</b>	<b>360</b>	<b>0</b>	<b>468</b>	
House 1	Oct '12 - Sep '13	24	162	0	0	0	72	
House 2	Oct '12 - Sep '13	24	162	0	0	0	72	
House 3	Oct '12 - Sep '13	24	162	0	0	0	72	
House 4	Oct '12 - Sep '13	24	162	0	0	0	72	
Dry Stack	Oct '12 - Sep '13	180	0	0	360	0	360	
<b>All Sources</b>	<b>Oct '12 - Sep '13</b>	<b>276</b>	<b>648</b>	<b>0</b>	<b>360</b>	<b>0</b>	<b>648</b>	
House 1	Oct '13 - Sep '14	24	162	0	0	0	72	
House 2	Oct '13 - Sep '14	24	162	0	0	0	72	
House 3	Oct '13 - Sep '14	24	162	0	0	0	72	
House 4	Oct '13 - Sep '14	24	162	0	0	0	72	
Dry Stack	Oct '13 - Sep '14	180	0	0	360	0	360	
<b>All Sources</b>	<b>Oct '13 - Sep '14</b>	<b>276</b>	<b>648</b>	<b>0</b>	<b>360</b>	<b>0</b>	<b>648</b>	
House 1	Oct '14 - Sep '15	24	162	0	0	0	72	
House 2	Oct '14 - Sep '15	24	162	0	0	0	72	
House 3	Oct '14 - Sep '15	24	162	0	0	0	72	
House 4	Oct '14 - Sep '15	24	162	0	0	0	72	
Dry Stack	Oct '14 - Sep '15	180	0	0	360	0	360	
<b>All Sources</b>	<b>Oct '14 - Sep '15</b>	<b>276</b>	<b>648</b>	<b>0</b>	<b>360</b>	<b>0</b>	<b>648</b>	
House 1	Oct '15 - Sep '16	24	162	0	0	0	72	
House 2	Oct '15 - Sep '16	24	162	0	0	0	72	
House 3	Oct '15 - Sep '16	24	162	0	0	0	72	
House 4	Oct '15 - Sep '16	24	162	0	0	0	72	
Dry Stack	Oct '15 - Sep '16	180	0	0	360	0	360	
<b>All Sources</b>	<b>Oct '15 - Sep '16</b>	<b>276</b>	<b>648</b>	<b>0</b>	<b>360</b>	<b>0</b>	<b>648</b>	

The version we received at TDA did not have the entire table. Please provide a copy of the full table.

RECEIVED

RECEIVED

FEB 22 2012

## **Declarations to Nutrient Management Plan:**

By my signature below, I affirm that I have read, understand, and will comply with the following stipulations from Tennessee's CAFO regulations that apply to my CAFO operation:

- 1) All animals in confinement are prevented from coming in direct contact with waters of the state.
- 2) All chemicals and other contaminants handled on-site are not disposed of in any manure, litter, process wastewater, or storm water storage or treatment system unless specifically designed to treat such chemicals and other contaminants.
- 3) Pesticide-contaminated waters will be prevented from discharging into waste retention structures. Waste from pest control and from facilities used to manage potentially hazardous or toxic chemicals shall be handled and disposed of in a manner that will prevent pollutants from entering waste retention structures or waters of the state.
- 4) Chemicals, manure/litter, and process wastewater will be managed to prevent spills. Spill clean-up plans will be developed and any equipment needed for spill clean-up will be available to facility personnel.
- 5) All sampling of soil and manure/litter is conducted according to protocols developed by UT Extension.
- 6) All records outlined in the permit that I am applying for will be maintained and available on-site.
- 7) Any confinement buildings, waste/wastewater handling or treatment systems, lagoons, holding ponds, and any other agricultural waste containment/treatment structures constructed or modified after April 13, 2006, are or will be located in accordance with NRCS Conservation Practice Standard 313.
- 8) A copy of the most recent Nutrient Management Plan will be kept as part of the farm records and will be maintained and implemented as written.
- 9) If applicable, all waste directed to under floor pits shall be composed entirely of wastewater (i.e. washwater and animal waste).
- 10) The Tennessee Department of Environment and Conservation Division of Water Resources will be notified of any significant wildlife mortalities near retention ponds or following any land application of animal wastes to fields.
- 11) All employees involved in work activities that relate to permit compliance will receive regular training on proper operation and maintenance (O&M) of the facility and waste disposal. Training shall include appropriate topics, such as land application of wastes, good housekeeping and material management practices, proper O&M of the facility, record keeping, and spill response and clean up. The periodic scheduled dates for such training shall be identified in the current Nutrient Management Plan.
- 12) There shall be no land application of nutrients within 24 hours of a precipitation event that may cause runoff. The operator shall not land apply nutrients to frozen, flooded, or saturated soils.

\_\_\_\_\_  
Signature of CAFO Owner/Operator

\_\_\_\_\_  
Date